

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

DENNIS BARLOW,  Plaintiff,  v.  CACH, LLC and TAYLOR LAW, PLLC,  Defendants.	CASE NO. 1:14-cv-01747
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**COMPLAINT**

**I. INTRODUCTION**

1. This is an action for statutory and actual damages, costs of the action and a reasonable attorney's fee brought by Plaintiff Dennis Barlow for violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq., by Defendants.

**II. JURISDICTION**

2. Jurisdiction of this court arises under 15 U.S.C. § 1692k(d), 28 U.S.C. § 1331 and 1337.

**III. PLAINTIFF**

3. Plaintiff Dennis Barlow is a natural person residing in Hamilton County, Indiana.

**IV. DEFENDANTS**

4. Defendant CACH, LLC is a for-profit foreign limited liability company with its principal place of business in Denver, Colorado.
5. At all times relevant herein, CACH, LLC was operating as a debt collector as defined by 15 U.S.C. § 1692a(6).
6. Defendant Taylor Law, PLLC is a for-profit foreign limited liability company with its principal place of business in Louisville, Kentucky.
7. At all relevant times herein, Taylor Law, PLLC was operating as a debt collector as defined by 15 U.S.C. § 1692a(6).

## **V. STATEMENT OF FACTS**

8. On January 24, 2014, Defendants filed a debt collection lawsuit, Cause No. 29D03-1401-CC-00827, against Plaintiff in Hamilton County Superior Court in an attempt to collect a debt allegedly incurred primarily for personal, family or household purposes.
9. CACH, LLC is not licensed as a collection agency in the State of Indiana.

## **VI. CLAIMS FOR RELIEF**

### **A. Fair Debt Collection Practices Act**

10. Plaintiff repeats, re-alleges and incorporates by reference paragraphs one through nine above.
11. Defendants violated the Fair Debt Collection Practices Act. These violations include, but are not limited to:
  - a. Filing a lawsuit against Plaintiff, and thereby conducting a collection agency, without being licensed in the State of Indiana as required by Indiana Code § 25-11-1-7, in violation of 15 U.S.C. § 1692d, 15 U.S.C. § 1692e and 15 U.S.C. § 1692f;
  - b. Filing a lawsuit on behalf of a client that is conducting a collection agency in the State of Indiana without being licensed as required by Indiana Code § 25-11-1-7, in violation of 15 U.S.C. § 1692d, 15 U.S.C. § 1692e and 15 U.S.C. § 1692f.
12. As a result of the violation of the Fair Debt Collection Practices Act, Defendants are liable to Plaintiff for her actual damages, statutory damages, costs, attorney fees and all other appropriate relief.

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in his favor and against Defendants in an amount that will compensate him for his actual damages, statutory damages, costs, attorney fees and all other appropriate relief.

Respectfully submitted,

s/ Robert E. Duff

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